

STATE OF IOWA  
BEFORE THE UTILITIES BOARD

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IN RE:	)	
	)	
OFFICE OF CONSUMER ADVOCATE,	)	
Petitioner,	)	
	)	
v.	)	Docket No. FCU-2016-0011
	)	
INTERSTATE POWER AND LIGHT	)	
COMPANY,	)	
Respondent	)	

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**MOTION TO MODIFY PROCEDURAL SCHEDULE**

**COMES NOW** Interstate Power and Light Company (IPL) requesting a limited modification of the Iowa Utilities Board's (IUB) October 25, 2016, Order Establishing Formal Complaint Proceeding, Procedural Schedule, and Technical Conference (October 25 Board Order). IPL requests that the technical conference, currently scheduled for October 31, 2016, be moved to the week of November 7, 2016. Further, IPL requests that the hearing, currently scheduled for December 5, 2016, be moved to no earlier than December 14, 2016. In support of its Motion, IPL states as follows:

**Argument**

I. Technical Conference Date

The October 25 Board Order set the technical conference for October 31, 2016. IPL requests a short extension, to the week of November 7, 2016, based on the nonavailability of key IUB staff on that date and the additional benefit of having additional information available for the consideration of the Board and the Office of Consumer Advocate.

IPL understands that key IUB staff are not available for the October 31, 2016, technical conference date. Given the importance of this issue to the Board and the mutual desire of all parties in this matter to resolve it as quickly as possible, IPL believes an extension is appropriate to ensure that critical IUB staff can participate in the technical conference.

Additionally, IPL is currently responding to two separate sets of data requests made by the Office of Consumer Advocate (OCA) in this matter. There are 28 data requests in total, some with subparts. The seven-day turnaround for the first set of responses is tomorrow, October 27, 2016, two business days before the currently scheduled technical conference. The second set of responses is due on November 1, 2016, the day after the currently scheduled technical conference. Moving the technical conference to the following week will ensure that IPL's responses to the OCA's data requests can be completed and reviewed by the OCA before the technical conference.

Finally, IPL staff are actively engaged in responding to the consumer complaints filed on this matter. As of the filing of this Motion, IPL has made its initial response to approximately forty of those complaints, and has responses due on over sixty more complaints on the date of the technical conference. A short extension of the technical conference timeline will allow IPL to complete its initial response on an even greater number of additional consumer complaints prior to the technical conference. Those responses will enhance IPL's, the Board's and OCA's preparation for the technical conference.

For the reasons stated above, IPL requests an extension to the week of November 7, 2016, for the technical conference.

II. Hearing Date

The October 25 Board Order set December 5, 2016, for the hearing in this matter. IPL requests an extension to on or after December 14, 2016, because of the unavailability of a key witness.

IPL witness Wendi Cigrand is out of the country from December 2 through December 12, 2016. In her role as Senior Manager Customer Support, she has been directly involved in the review and resolution of the estimated billing situation. She will discuss staffing issues, internal processes, use of the new billing system, interactions with customers, and certain elements of complaint resolution. Her availability is critical not only to ensure that IPL has the opportunity to explain what occurred, and why, but also to ensure that the Board and OCA receive complete, timely information on this matter.

Because of Ms. Cigrand's unavailability, IPL requests an extension of the hearing date to on or after December 14, 2016. IPL has no objection to any change in the testimony due dates to facilitate this request.

### **Conclusion**

For the reasons stated above, IPL respectfully requests that the technical conference be moved to the week of November 7, 2016, and the hearing be moved to no sooner than December 14, 2016.

Dated this 26<sup>TH</sup> day of October, 2016.

Respectfully submitted.

Interstate Power and Light Company

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